

261905 RSPA-03-16488-2

**EXEMPTION EVALUATION FORM**  
(Revised as of May 20, 1998)

**PART 1 APPLICANT**

1A. Exemption Number : 13323-E

Application Number: 48274

Project Officer : Cheryl West Freeman

1B. Date of Application: 11/4/03

1C. Name of Applicant: Larry Obee

Title: Marine Logistic Coordinator  
Company Name: Ocean Drilling Program/Texas A&M Univ.  
Address: 1000 Discovery Drive  
College Station, Texas 77845

Phone Number: (979)845-2056

1D. U.S. Agent for foreign applicant or Consultant Name: N/A

Company name:  
Address:  
Phone Number:

1E. Summary of What Applicant is Requesting:  
To authorize transportation in commerce of certain non-DOT specification cylinders containing samples of methane hydrate (frozen methane gas).

1F. Regulation(s) exempted: 49 CFR §173.302 in that the non-DOT specification cylinder is not authorized therein.

1G. Modes of Transportation:

|                          |                        |
|--------------------------|------------------------|
| 1 Motor Vehicle ( X )    | 2 Rail Freight ( )     |
| 3 Cargo Vessel ( )       | 4 Cargo Aircraft ( X ) |
| 5 Passenger Aircraft ( ) |                        |

**PART 2 REVIEW FOR DOCKETING**

- ( ) Application contains sufficient information to support docketing.
- ( ) Application is incomplete or unnecessary and should be returned for the following reason(s).

**PART 3 HAZARDOUS MATERIALS**

3A. Hazardous Materials to be shipped:

| Proper Shipping Name/<br>Hazardous Materials<br>Description | Hazard<br>Class/<br>Divisio<br>n | Identi-<br>ficatio<br>n<br>Number | Packing<br>Group |
|---|----------------------------------|-----------------------------------|------------------|
| Methane, compressed   | 2.1                              | UN1971                            | N/A              |
|   |                                  |                                   |                  |
|   |                                  |                                   |                  |

3B. Is the hazardous material capable of being detonated?  
(If No - go to 3C)

If so, under what conditions?

- (1) What special precautions have been taken to prevent these conditions in transportation?
- (2) Has the hazardous material been classed as an explosive? \_
  - Has it been tested and approved under § 173.56?
  - Is stabilization required and what type?

3C. Other risks presented by the material that warrant special assessment. (e.g. flammable or toxic gases produced upon contact with water, material can initiate or enhance a fire, article or device contains an ignition



- 5C. What controls have been offered or might be appropriate to mitigate risks otherwise presented with the exemption?
- 5D. What special data collection and reporting requirements are needed to document experience and exemption performance?

#### **PART 6 SHIPPING EXPERIENCE**

- 6A. What has the generally shipping experience been with this type of material, package, and operation?
- 6B. Can any rough estimate be made on the extent of the use of this exemption? How many shipments will be made and how much material will be transported?
- 6C. Is this a new package with no shipping experience?

#### **PART 7 SAFETY AND RISK ASSESSMENT**

- 7A. 49 CFR § 107.105(d) prescribes requirements for justification of an exemption through comparisons with established levels of safety and risk assessment. Has the applicant demonstrated equivalent levels of safety or provided an appropriate risk analysis?
- 7B. What are the hazards (worst case) posed by the proposed exemptions? What could go wrong? Are the risks significant? What is the degree of uncertainty as to likelihood or consequences?
- 7C. What are the benefits to the public and the applicant of granting the exemption? What trade-offs have been made?
- 7D. Does this exemption (and other similar exemptions) point to the need for possible regulatory changes? If so what other information is needed to support a regulatory change.

#### **PART 8 DOCKET COMMENTS/INFORMATION**

- 8A. Date checked: \_\_\_\_
- 8B. Comments: \_\_\_\_ (If Yes, summarize)
- 8C. Has **CONFIDENTIAL** or **PROPRIETARY** information (49 CFR

note in Part VI concerning confidential information.

This exemption is based on Ocean Drilling Program/Texas A&M University Competent Authority Approval CA 20033060002 which expires August 31, 2004. DHM20 was requested by DHM30 to convert the CAA to an exemption based on the approval staff's prior review of Texas A&M University's application. Retest criteria was added to insure packagings integrity similar to other exemptions. The retest includes visual internal & external with hydrostatic testing at least every 5 years at 1950 psig, 1.3 service pressure of 1500psig.

Office of Hazardous Materials Technology (OHMT)

Office of Hazardous Materials Exemptions and Approvals (OHMEA)

Office: DHM-22.2

Project Officer/Date: <sup>CWF</sup> Cheryl West Freeman 11/17/03

Reviewer/Date: Stanley Staniszewski 11/18/2003 <sup>SS</sup>

Office Director/Date: SS for CHA 11/18/2003